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October 15, 2020

Project No. CF167-1906

Mr. Hunter Young
Remedial Project Manager, Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Oregon Operations Office
805 SW Broadway, Suite 500
Portland, OR 97205-3331

**Subject: Q3 July 1–September 30, 2020 Quarterly Progress Report, Arkema Project Area
Administrative Settlement Agreement and Order on Consent for Remedial
Design at the River Mile 7 West Project Area
U.S. EPA Region 10 CERCLA Docket No. 10-2020-0054**

Dear Mr. Young:

On behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), this letter presents the quarterly progress report for work performed on the Arkema Project Area. This progress report is being submitted in accordance with Section 4.1 of Appendix A1, Arkema Statement of Work for the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054) entered into by Arkema and the U.S. Environmental Protection Agency (EPA) with an effective date of February 21, 2020.

- a) Actions that have been taken toward achieving compliance with the Settlement:
- Received EPA's comments on the draft Pre-design Investigation (PDI) work plan on September 14, 2020.
 - Participated in a meeting with EPA to discuss key comments on the draft PDI Work Plan on September 30, 2020.
 - Submitted a document providing a summary and tentative agreements from the LSS/EPA September 30, 2020 meeting on October 2, 2020.
 - Received an email from EPA on October 9 indicating that the tentative agreements described in the October 2 document are consistent with EPA's understanding of the outcome of the September 30 meeting.

- b) List of all results of validated sampling, tests, and all other data received or generated by Respondent Arkema to comply with the Settlement:
 - None.
- c) List of all deliverables that Respondent Arkema submitted to EPA:
 - Draft PDI Work Plan.
- d) List of all activities scheduled for the next quarter:
 - Provide a table responding to EPA comments on the draft PDI Work Plan.
 - Prepare a final PDI work plan.
 - Initiate the PDI field sampling in accordance with the EPA-approved PDI Work Plan.
- e) Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Arkema RD Work, and a description of efforts made to mitigate those delays or anticipated delays:
 - None.
- f) List of any modifications to the work plans or other schedules that Respondent Arkema has proposed or that have been approved by EPA:
 - A table responding to EPA's comments on the draft work plan will be submitted to EPA for approval prior to finalizing the PDI work plan, as requested by EPA during the September 30, 2020 meeting. A submittal date for the Final PDI work plan will be determined by EPA after EPA's review and acceptance of the response to comment table.
- g) List of all activities undertaken in support of the CIP during the reporting period and those to be undertaken in the next quarter:
 - EPA has not requested any community involvement plan support for the Arkema Project Area.

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Please contact me at (503) 943-3614 or Mike Pinto at (484) 437-1991 if you have any questions or comments pertaining to this progress report.

Sincerely,

A handwritten signature in black ink, appearing to read "Eron Dodak", is positioned above the printed name.

Eron Dodak, R.G.
Senior Consultant